

Power Integrations, Inc. v. Fairchild Semiconductor

Case No. 04-1371 JJF

**Plaintiff Power Integrations Inc.'s Deposition Designations
and Counter Counter-Designations*
September 4, 2007**

DATE	DEPONENT	PARTY	PLAINTIFF'S DESIGNATIONS
09/12/2005	Choi, Hang-Seok	Fairchild	6:13-15 7:13-17 10:21-25 14:2-13 23:20-22 23:25-24:3 26:11-19 26:21-23 27:10-15 28:6-8 28:11-12 42:19-43:3 44:2-9 44:11-17 46:6-9 46:11-12 *75:23-76:3 *76:14-17 *81:9-21 *88:11-23 *89:8-10 *89:14 *91:9-13 116:1-117:1
03/28/2006	Conrad, Robert	Fairchild	6:24-7:1 7:4-17 9:16-18 60:11-13 60:16-18 61: 5-7 61:14-62:6 67:5-14 67:19-68:6 68:9-12 69:11-15 77:7-13 81:12-19 83:5-12 83:16-20

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			84:8-11 84:14-25 85:3-4 *86:2-3 126:10-128:20 129:4-8 129:18-22 129:25-131:5 131:25-132:13 132:16-134:5 134:20-135:3
08/25/2006	Conrad, Robert	Fairchild	222:11-223:19 223:21-224:5 257:12-16 257:22-258:13 258:20-259:10 259:13-260:8 260:19-261:1 262:13-14 262:17-24 289:6-16 289:20-290:4 290:8-13 290:16-20
09/09/2005	Im, Sang-Tae	Fairchild	6:19-21 9:14-15 9:18-20 9:24-10:1 10:7-9 16:13-17:13 19:1-7 33:20-34:9 38:10-39:1
09/07/2005	Jang, Kyung-Oun	Fairchild	6:22-24 7:23-8:1 26:3-7 29:6-8 29:23-30:7 30:24-31:1 33:10-16 43:21-23 43:25-44:6

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09/08/2005	Jang, Kyung-Oun	Fairchild	33:4-24 *35:12-15 *35:17-36:7 *36:10-14 37:7-38:4 38:10 45:21-46:1 46:13-24 47:24-49:12 49:20-50:25 61:11-18 67:5-19 *69:6-13
09/01/2005	Jeon, Chang-Ki	Fairchild	6:19-20 7:10-12 33:22-25 34:3-16 35:1-2 35:10-25 36:5-17 39:21-40:3 40:7-8 40:12-13 40:18 40:20-22 40:25-41:1 41:3-4 41:7-9 41:11-14 41:23-42:1 42:14-18 43:10-12 43:15-21 43:23-24 45:1-4 45:7-9

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09/02/2005	Jeon, Chang-Ki	Fairchild	15:22-16:14 17:3-6 17:15-19 17:22-23 19:11-23 20:21-21:3 21:9-22:3 22:8-12 22:22-23:7 26:17-27:1 27:25-28:10 28:25-29:2 29:5-8 29:10-12 29:14-15 29:18-30:13 30:16-20 37:19-38:8 40:18-24 *41:6-9 42:2-20 43:4-8 43:14-24 44:15-20 45:10-18 *75:5-16 *75:21-22 *76:8-12
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09/13/2005	Lim, Chang-Sik	PI	5:11-13 8:14-15 29:15-23 30:8-24 31:3-10 31:12-20 33:7-23 33:25-34:1 34:20-35:1 35:4-8 43:25-44:18 44:21-25 45:23-46:3 46:5-14 52:21-53:3 53:5-11 53:13 53:15-17 53:19-20 53:22-24
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12/09/2005	Sarkissian, Vahe	Fairchild	6:11-14 13:7-8 *14:10-13 28:22-25 *32:22-24 54:14-15 54:18-25 55:11-56:5 *56:21-57:5 59:17-19 66:18-67:1 67:7-11 68:1-8 69:16-20 71:3-19 73:4-10 *74:14-21 75:4-7 *78:2-79:1 87:22-88:1 89:12-18 89:20-22 93:7-8 93:10-11 93:15-17 96:3-8 96:14-24 98:1-3 98:5-99:1 99:19-22 101:24-102:7 *102:18-19 *103:6-10 107:1-4 107:7-13 107:18-20 107:22-24 *110:17-25 *115:16-19 125:13-20
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EXHIBIT 12A

Power Integrations v. Fairchild

Exhibit 12 to the Proposed Pretrial Order

**POWER INTEGRATIONS' DEPOSITION DESIGNATIONS AND
FAIRCHILD'S OBJECTIONS**

Defendants Fairchild Semiconductor International, Inc. and Fairchild Semiconductor Corporation (collectively, "Fairchild") hereby respond and object to Plaintiff Power Integrations, Inc.'s ("Power Integrations") June 16, 2006 deposition designation.

GENERAL OBJECTIONS

1. Fairchild incorporates and maintains all of the specific objections raised during the witnesses' depositions, regardless of whether the depositions has been "designated" by either party. To the extent the objections have been designated, the objection should be resolved before any testimony is provided to the jury. The objections, themselves, should not be provided to the jury.

2. Fairchild objects to each and every deposition designation and exhibit to the extent that it relates to alleged activities prior to October 20, 2004. As the Court has repeatedly held, Power Integrations is not permitted to recover damages prior to October 20, 2004 because of Power Integrations' decision not to mark its products with the number of the asserted patents. Moreover, the Court has expressly held that damages calculations must be based on conditions occurring on or after October 20, 2004. Since Power Integrations cannot recover damages based on or resulting from any alleged infringement prior to October 20, 2004, testimony concerning such activity should be excluded because it is not relevant and potentially prejudicial.

3. Fairchild objects that, despite Fairchild's repeated requests, Power Integrations has refused to identify the asserted claims, the accused products, and how Power Integrations intends to "group" the products together for purposes of proving its infringement allegations. Without understanding the bases of Power Integrations' infringement allegations, it is unclear what portion (if any) of the deposition testimony is relevant and what portion or portions are improperly prejudicial, cumulative, or irrelevant. Fairchild reserves its rights to raise additional

objections and/or counter-designate additional deposition testimony, if appropriate, once Power Integrations provides this information.

4. Fairchild objects to the each and every deposition designation to the extent that it relates to products that are not accused by Power Integrations of infringing the asserted claims. Throughout the case, Power Integrations has continually changed its identification of accused products (and, thus far, refuses to identify the products it will accuse at trial). This ambiguity renders a great deal of the deposition testimony designated by Power Integrations irrelevant, confusing, and prejudicial. For instance, Power Integrations would typically question a witness about the “accused devices” without identifying for the witness what devices Power Integrations was accusing. Even assuming that the witness understood what devices were accused by Power Integrations at the time of the witness’s deposition, Power Integrations appears set to accuse different devices at trial. Thus, the “accused products” referred to by the witness was both over-inclusive (including devices that Power Integrations no longer accuses) and under-inclusive (not including devices that Power Integrations now appears to accused). Consequently, such testimony cannot be relied upon with respect to the presently accused products and would be hopelessly confusing for a jury, which would be unable to understand to what devices the questions and answers related.

5. Fairchild objects to each and every deposition designation concerning Fairchild’s “FPS products” or “Green FPS products”. Power Integrations has accused some, but not all, of these devices of infringing the asserted claims. Thus, while it may have been appropriate for Power Integrations to seek discovery on the broad line of Fairchild products, providing the jury with deposition testimony concerning “FPS products” or “Green FPS products” (and not limiting it to the specific products presently accused of infringing) is improper, irrelevant, and confusing. For instance, questions concerning whether a particular customer purchases Fairchild’s “FPS

products” are irrelevant and prejudicial since there is no evidence that that customer purchases the specific products at issue in this case.

6. Fairchild objects to each and every deposition designation to the extent that it is incomplete or deceptive. In a number of cases, Power Integrations has designated an answer but not a question, a question but not the complete answer, or a question and then an “answer” relating to a completely different question. Such manipulation of the deposition testimony is inappropriate and should be prohibited.

7. Fairchild objects to each and every deposition designation to the extent that it constitutes hearsay, lacks foundation, or otherwise fails to meet the appropriate evidentiary standard. For instance, Power Integrations has designated testimony from third party witness Shawn Slayton concerning whether Fairchild’s devices infringe the asserted claims even though Mr. Slayton testified that (i) he did not know what claims are asserted, (ii) did not know what products are accused, (iii) had no legal training or experience that would permit him to testify on infringement or the appropriate remedy. Similarly, Mr. Slayton’s testimony made clear that he had no direct evidence that the accused devices are even imported into the United States (instead, relying on hearsay and speculation).

8. Fairchild objects to each and every deposition designation to the extent that it relies upon, refers to, or relates to an exhibit to which Fairchild has objected. Fairchild maintains its objections to these exhibits and testimony concerning such exhibits should be limited.

9. Several of the witnesses whose depositions Power Integrations has designated were deposed both as individuals and as 30(b)(6) witnesses. In many such cases, however, Power Integrations identifies testimony that is beyond the scope of the 30(b)(6) topic (and, thus, was offered as part of the individual’s deposition and not on behalf of Fairchild). Such individual testimony is often based on speculation, assumptions, or hearsay and Fairchild objects that such testimony would be of little or no assistance to the jury. Indeed, it would likely confuse

the jury or be otherwise prejudicial since the jury would be unable to determine at what time the witness testified on behalf of Fairchild.

10. Fairchild objects to Power Integrations' designation of attorney objections, argument, or colloquy. Except as is necessary to give meaning to the question (for instance, where the attorneys discuss and agree upon a narrower understanding of the question), such attorney statements are not testimony and should not be provided to the jury.

11. Once Power Integrations identifies the asserted claims, the accused products, and how it intends to "group" those products together to substantiate its infringement allegations, Fairchild will meet and confer with Power Integrations concerning the scope and use of the deposition testimony designated by Power Integrations. While Fairchild hopes that the parties will be able to resolve any dispute without involving the Court, Fairchild expressly retains its right to move in limine or otherwise seek the assistance of the Court to preclude Power Integrations from offering irrelevant, prejudicial, confusing or cumulative testimony.

SPECIFIC OBJECTIONS

Fairchild hereby incorporates all of its general objections and the objections raised during the witness's deposition. Moreover, Fairchild raises the following specific objections based on what it understands to be Power Integrations' intended use of the deposition testimony.

Key to Objections:

R = Irrelevant – Federal Rules of Evidence 401 and 402 (testimony does not have any tendency to make the existence of any fact that is of consequence to the determination of the action more probable or less probable than it would be without the evidence).

P = Prejudice, Confusion, or Waste of Time – Federal Rule of Evidence 403 (although possibly relevant, the designated testimony's probative value is substantially outweighed by the danger of unfair prejudice, confusion of the issues, or misleading the jury, or by considerations of undue delay, waste of time, or needless presentation of cumulative evidence).

A = Ambiguous/Assumes Facts Not In Evidence (for instance, the question refers to the "accused products", which are different from the products that Power Integrations accuses at trial).

I = Incomplete (partial question or answer)

V = Violates the Court's order precluding evidence related to damages prior to the filing of the complaint

F = Lacks foundation

H = Hearsay – Federal Rules of Evidence 801 and 802 (the testimony constitutes, includes, or refers to an out of court statement offered to prove the truth of the matter asserted)

O = Improper opinion testimony from a lay witness

Fairchild reserves the right to raise additional objections, if necessary, once Power Integrations identifies the trial phase in which each deposition passage will be used.

Fairchild's Objections to Power Integrations' Designations of the January 10, 2006 Deposition of J. Barnes (Fairchild)

POWER INTEGRATIONS' DESIGNATION	FAIRCHILD'S SPECIFIC OBJECTION
4:20-24	
6:3-9	
13:6-17	I (omits part of question)
40:13-22	I (omits Fairchild's objections that limit deposition testimony); R + P
46:4-6	A, R+ P ("accused products" in question is different from products accused at trial)
80:15-20 80:23-81:2 81:11-13 81:16-18	A, R+ P ("accused products" in question is different from products accused at trial)
87:19-20 87:25-88:5	A, R+ P ("accused products" in question is different from products accused at trial)
88:17-25	A, R+ P ("accused products" in question is different from products accused at trial) (location of Fairchild headquarters is irrelevant)
98:4-5 98:7-11	A, R+ P ("accused products" in question is different from products accused at trial)
98:12-98:17	A, R+ P (question not limited to the accused products; even if so limited, "accused products" at deposition is different from products accused at trial); V (violates Court's order; not limited to activities after 10/20/04)
98:18-99:1	A, R+ P ("accused products" in question is different from products accused at trial) ; V (violates Court's order; not limited to activities after 10/20/04)
99:12-20	A, R+ P ("accused products" in question is different from products accused at trial); lacks foundation and constitutes speculation; V (violates Court's order; not limited to activities after 10/20/04)

Fairchild's Objections to Power Integrations' Designations of the January 11, 2006 deposition of T. Beaver (Fairchild)

POWER INTEGRATIONS' DESIGNATION	FAIRCHILD'S SPECIFIC OBJECTION
5:9-13	
6:20-7:1	
15:1-12	
15:15-16:2	
16:3-5	A, R+ P (Power Integrations has never accused "all FPS products")
16:22-17:4	R + P (testimony does not relate to the accused devices; prejudicial and waste of time)
19:2-3	
19:6-23	
20:24-25 21:3-14	R + P (testimony does not relate to the accused devices; prejudicial and waste of time)
23:23-24:21	
27:25-28:15	
30:19-32:2 32:7-33:6 35:20-36:4 36:7-17 37:12-17 38:4-39:22	H, F, R + P (waste of time, potentially confusing as there is no testimony that the reports, meetings, or other subjects discussed relate to the accused products)
40:23-41:5	
41:8-42:11	
42:14-20	
42:23-44:5	
44:8-20	
48:16-49:2	
49:18-24	
50:3-8	
50:9-12 50:14-21	R + P (waste of time, potentially confusing as there is no testimony relating this to the accused devices. Specifically, there is no testimony that Motorola, Siemens, or Samsung have bought the accused devices in the relevant time from Fairchild)
51:6-12 51:22-23 52:1-19	R + P (waste of time, potentially confusing as there is no testimony relating this to the accused devices)
58:20-59:1	
59:4-6	
59:18-23 60:2-21	R + P (waste of time, potentially confusing as there is no testimony relating to price deviations on the accused products in the relevant time period); V (violates Court's order; not limited to activities after 10/20/04)
61:1-13 62:1-2 62:5-7 62:21-25	R + P (waste of time, potentially confusing as there is no testimony relating the "very big deals" to the accused products or the the relevant time period); V (violates Court's order; not limited to activities after 10/20/04)

POWER INTEGRATIONS' DESIGNATION	FAIRCHILD'S SPECIFIC OBJECTION
64:7-10 64:12-21 64:25-65:2	I (refers to testimony not designated for the jury); R + P (waste of time, potentially confusing as there is no testimony relating the "very big deals" to the accused products or the the relevant time period); V (violates Court's order; not limited to activities after 10/20/04)
69:4-11	I (refers to testimony not designated for the jury); A, R+ P (waste of time, potentially confusing as Power Integrations has never accused the "Green FPS product line")
69:12-15	
69:17-20	
70:2-5	
74:23-75:19 76:4-5 76:7-11 76:13-14	A, R + P (waste of time, potentially confusing as there is no testimony concerning how the "Centers of Excellence" relate to the accused devices and Power Integrations has never accused all "switch mode power supplies and industrial white goods")
82:14-25 83:3-11	I (refers to testimony not designated for the jury); R + P (waste of time, potentially confusing as there is no testimony concerning the accused devices)
91:17-20 91:23-92:7	I (partial question and refers to testimony not designated for the jury).
99:3-10	I (refers to testimony not designated for the jury); R + P (calls for "guess" and does not relate to the accused devices)
106:1-5 106:8-9	I (refers to testimony not designated for the jury)
107:14-108:10 108:19-23 108:25-109:11	H + F; R + P (does not relate to the accused devices)
114:1-7 114:10 114:23-115:14	V (Beaver exhibit 9 [the underlying exhibit] is dated 4/11/04 and has been excluded as prior to the filing of the complaint; any alleged infringement prior to 10/20/04 is irrelevant, a waste of time, prejudicial, and potentially confusing;
119:4-7 119:10-20	I (refers to testimony not designated for the jury); R + P (not related to the accused devices)
142:3-6	

Fairchild's Objections to Power Integrations' Designations of the September 12, 2005 deposition of H.S. Choi (non-party Fairchild Korea)

POWER INTEGRATIONS' DESIGNATION	FAIRCHILD'S SPECIFIC OBJECTION
6:13-16	
7:13-17	P (confusing as not all designated testimony on behalf of Fairchild)
8:7-15	R + P (irrelevant, waste of time, potentially confusing)
9:6-10:1	
10:21-25	A, R+ P (Power Integrations has never accused "all FPS products")
13:18-21	A, R+ P (Power Integrations has never accused all "FPS products")
13:23-15:4	A, R+ P (Power Integrations has never accused all "FPS products"); V (violates Court's order; not limited to activities after 10/20/04)
17:15-17	
19:3-4 19:6-11	R+ P (question relates to all 30,000 Fairchild products and is not limited to the accused products); V (violates Court's order; not limited to activities after 10/20/04)
19:22-25	R+ P (question relates to all 30,000 Fairchild products and is not limited to the accused products); V (violates Court's order; not limited to activities after 10/20/04)
21:12-16 21:18-21 21:23-22:4	R+ P (question relates to all 30,000 Fairchild products and is not limited to the accused products; irrelevant; potentially confusing); V (violates Court's order; not limited to activities after 10/20/04)
23:20-22 23:25-24:3	R+ P (question relates to all 30,000 Fairchild products and is not limited to the accused products; irrelevant; potentially confusing); V (violates Court's order; not limited to activities after 10/20/04)
25:22-26:2	
26:11-19 26:21-23	R, P, V (violates Court's order; not limited to activities after 10/20/04)
27:10-18	R, P, V (violates Court's order; not limited to activities after 10/20/04)
28:6-8 28:11-12	R, P, V (violates Court's order; not limited to activities after 10/20/04)
28:14-18	R + P (there is no understanding that the witnesses understanding or datasheets use of "soft start" comports with the Court's construction); V (violates Court's order; not limited to activities after 10/20/04)
30:10-25	R + P (there is no understanding that the witnesses understanding or datasheets use of "soft start" comports with the Court's construction); V (violates Court's order; not limited to activities after 10/20/04)
35:15-36:1	I (question not designated); R + P (irrelevant and potentially confusing); V (violates Court's order; not limited to activities after 10/20/04; testimony is not limited to the products Power Integrations accuses at trial but includes non-accused FPS devices; testimony is not limited to the products Power Integrations accuses at trial but includes non-accused Fairchild devices)
38:3-5 38:7-12 38:14-23	R + P (Power Integrations has not asserted any copyright or other claims with respect to its datasheets; irrelevant and potentially confusing)
42:19-43:6 43:14-44:9 44:11-17	R, P + V (Choi exhibit 3 [the underlying exhibit] is dated 11/13/03 and has been excluded as prior to the filing of the complaint; any alleged infringement prior to 10/20/04 is irrelevant, a waste of time, prejudicial, and potentially confusing; Power Integrations has not asserted any copyright or other claims with respect to its datasheets; testimony is not limited to the products Power Integrations accuses at trial but includes non-accused Fairchild devices)

POWER INTEGRATIONS' DESIGNATION	FAIRCHILD'S SPECIFIC OBJECTION
45:3-46:1 46:4-9 46:11-12	R, P + V (Choi exhibit 4 [the underlying exhibit] is dated 11/6/03 and has been excluded as prior to the filing of the complaint; any alleged infringement prior to 10/20/04 is irrelevant, a waste of time, prejudicial, and potentially confusing; testimony is not limited to the products Power Integrations accuses at trial but includes non-accused Fairchild devices)
47:22-48:15 48:17-49:7 49:9-16	R, P + V (Choi exhibit 5 [the underlying exhibit] is dated 1/04 and has been excluded as prior to the filing of the complaint; any alleged infringement prior to 10/20/04 is irrelevant, a waste of time, prejudicial, and potentially confusing; Power Integrations has not asserted any copyright or other claims with respect to its datasheets; testimony is not limited to the products Power Integrations accuses at trial but includes non-accused Fairchild devices)
62:25-64:16	R, P + V (Choi exhibit 12 [the underlying exhibit] is dated 10/03 and has been excluded as prior to the filing of the complaint; any alleged infringement prior to 10/20/04 is irrelevant, a waste of time, prejudicial, and potentially confusing; testimony is not limited to the products Power Integrations accuses at trial but includes non-accused FPS devices)
81:23-82:21	
87:2-6	
87:8-25	
88:19-23	
89:16-21 89:23	A, R+ P (question relates to all FPS products and is not limited to the accused products); V (violates Court's order; not limited to activities after 10/20/04)
91:9-13	A, R+ P (question relates to all FPS products and is not limited to the accused products); V (violates Court's order; not limited to activities after 10/20/04)
108:15-109:4	R, P + V (Choi exhibit 17 [the underlying exhibit] is dated 7/03 and has been excluded as prior to the filing of the complaint; any alleged infringement prior to 10/20/04 is irrelevant, a waste of time, prejudicial, and potentially confusing; testimony is not limited to the products Power Integrations accuses at trial but includes non-accused FPS devices)
112:10-23	R, P + V (Choi exhibit 19 [the underlying exhibit] is dated 11/23/03 and has been excluded as prior to the filing of the complaint; any alleged infringement prior to 10/20/04 is irrelevant, a waste of time, prejudicial, and potentially confusing; testimony is not limited to the products Power Integrations accuses at trial but includes non-accused FPS devices)
113:16-21	H + F
115:8-15	H + F
116:1-22 116:25-117:1	H, F, R, P + V (Choi exhibit 21 [the underlying exhibit] is dated 12/5/03 and has been excluded as prior to the filing of the complaint; any alleged infringement prior to 10/20/04 is irrelevant, a waste of time, prejudicial, and potentially confusing; testimony is not limited to the products Power Integrations accuses at trial but includes non-accused FPS devices)
117:14-19 118:23-119:13 119:15-16 119:18-22	H, F, R, P + V (Choi exhibit 21 [the underlying exhibit] is dated 12/8/03 and has been excluded as prior to the filing of the complaint; any alleged infringement prior to 10/20/04 is irrelevant, a waste of time, prejudicial, and potentially confusing; testimony is not limited to the products Power Integrations accuses at trial but includes non-accused FPS devices)

Fairchild's Objections to Power Integrations' Designations of the March 28, 2006 Deposition of R. Conrad (Fairchild)

POWER INTEGRATIONS' DESIGNATION	FAIRCHILD'S SPECIFIC OBJECTION
6:24-7:1	
7:4-17	
9:2-4 9:15-18	A, R + P (testimony does not relate to the accused devices and Power Integrations has never accused all "FPS or Fairchild Power Switch products")
9:19-10:3	
38:22-24	I (does not include complete question); R + P (testimony does not relate to the accused devices)
39:02-10	
44:7-12	
45:10-19	A, R + P (testimony does not relate to the accused devices and Power Integrations has never accused any "standardized products" or all "analog products")
60:11-13 60:16-18	R + P (question not limited to the accused products); V (violates Court's order; not limited to activities after 10/20/04)
61:5-7 61:14-62:6	R + P (question not limited to the accused products); V (violates Court's order; not limited to activities after 10/20/04)
67:5-68:6 68:9-12	R + P (neither the testimony nor Conrad Exhibit 2 (the underlying exhibit) relate to any accused product)
69:11-15 69:19-70:5 70:9-18 71:1-17	R + P (neither the testimony nor Conrad Exhibit 2 (the underlying exhibit) relate to any accused product); H + F
74:18-20 74:23-25	R + P (does not relate to the accused products or the Power Integrations products for which Power Integrations claims to have lost sales)
74:23-25	
75:21-24	
76:2-12	
76:15-19	
76:21-25	
77:7-13 79:6-18 79:22-24 81:12-19 83:5-12 83:16-20 84:8-11 84:14-25 85:3-4	A, H, F, R, P + V (Conrad exhibit 3 [the underlying exhibit] is dated 10/03 and has been excluded as prior to the filing of the complaint; any alleged infringement prior to 10/20/04 is irrelevant, a waste of time, prejudicial, and potentially confusing; testimony is not limited to the products Power Integrations accuses at trial but includes non-accused "Green FPS" devices)

Fairchild's Objections to Power Integrations' Designations of the September 30, 2005 Deposition of H. Engelbrechten (non-party)

POWER INTEGRATIONS' DESIGNATION	FAIRCHILD'S SPECIFIC OBJECTION
6:12-15	
7:15-28	
7:19-22	R + P (In 2005, witnesses testified that he worked at Fairchild "until June of this year". The jury will be confused by this irrelevant testimony and assume that he worked at Fairchild the year of the trial)
8:10-14	
8:22-25	R + P (In 2005, witnesses testified that he worked at Fairchild until June of "this year". The jury will be confused by this irrelevant testimony and assume that he worked at Fairchild the year of the trial)
14:3-14	
14:16-15:2	
15:16-19	
21:9-22:12	R + P (testimony does not relate to the accused devices)
29:6-12 29:17-31:3	R + P (question not limited to the accused products); V (violates Court's order; not limited to activities after 10/20/04)
32:13-33:1	R + P (question not limited to the accused products); V (violates Court's order; not limited to activities after 10/20/04)
38:19-39:20	R + P (question not limited to the accused products); V (violates Court's order; not limited to activities after 10/20/04)
42:13-43:11	I (refers to testimony not designated for the jury); R + P (question not limited to the accused products); V (violates Court's order; not limited to activities after 10/20/04)
46:6-17	R + P (question not limited to the accused products); V (violates Court's order; not limited to activities after 10/20/04)
55:13-57:11 57:14-19	A, R+ P (question not limited to the accused products but instead relates to non-accused "Green FPS" and "FPS" devices); V (violates Court's order; not limited to activities after 10/20/04)
62:11-63:8	R + P (question not limited to the accused products or the relevant time frame); V (violates Court's order; not limited to activities after 10/20/04)
63:24-64:18	R + P (question not limited to the accused products or the relevant time frame); V (violates Court's order; not limited to activities after 10/20/04)
81:6-19 88:21-89:22	R + P (question not limited to the accused products or the relevant time frame); V (violates Court's order; not limited to activities after 10/20/04)
90:8-91:1	R + P (question not limited to the accused products or the relevant time frame); V (violates Court's order; not limited to activities after 10/20/04)
103:9 103:11-104:22	R + P (question not limited to the accused products or the relevant time frame); V (violates Court's order; not limited to activities after 10/20/04)
107:3-5 107:9-24	V (Engelbrechten exhibit 3 [the underlying exhibit] is dated 1/5/04 and has been excluded as prior to the filing of the complaint; any alleged infringement prior to 10/20/04 is irrelevant, a waste of time, prejudicial, and potentially confusing); I (refers to testimony not designated for the jury)
111:14-112:14 112:21-113:23	R + P (testimony does not relate to the accused devices or the relevant time frame); V (violates Court's order; not limited to activities after 10/20/04)
114:25-115:23	R + P (testimony does not relate to the accused devices or the relevant time frame); V (violates Court's order; not limited to activities after 10/20/04)
118:7-24	I (refers to testimony not designated for the jury); R + P (testimony does not relate to the accused devices or the relevant time frame); V (violates Court's order; not limited to activities after 10/20/04)

POWER INTEGRATIONS' DESIGNATION	FAIRCHILD'S SPECIFIC OBJECTION
120:7-123:23 124:1-9 124:11-16	F + H; R + P (testimony does not relate to the accused devices or the relevant time frame); V (violates Court's order; not limited to activities after 10/20/04)
127:18-128:16	I (not colored yellow in deposition transcript; does not contain full question); R + P

Fairchild's Objections to Power Integrations' Designations of the October 4, 2005 Deposition of R. Gendron (Fairchild)

POWER INTEGRATIONS' DESIGNATION	FAIRCHILD'S SPECIFIC OBJECTION
4:6-7	
11:1-5	
11:14-15	
12:1-2	
12:4-7	
12:10-13:9	
16:20-17:11	I (question refers to testimony not designated for the jury)
17:14-15	
18:23-19:8 19:13-16 19:18-21	I (question refers to testimony not designated for the jury; omits Fairchild's objections that limit deposition testimony); R + P
22:5-19	A, R+ P (refers to products that are not accused; Power Integrations has never accused all "FPS products"; Godbout Exhibit 1 (the underlying exhibit) is also prejudicial and confusing as Power Integrations is no longer accusing all of the identified products and now accuses new products not part of Godbout Exhibit 1)
34:3-5 34:10-18 34:22-35:1 35:7-21	R + P (does not relate to the accused devices or the relevant time)
36:13-15 36:20-37:5 37:8-11 37:19-25 38:6-16 38:18-39:5 39:9-18 39:20	A, R+ P (refers to products that are not accused; Power Integrations has never accused all "FPS" or "Green FPS" products; Godbout Exhibit 1 (the underlying exhibit) is also prejudicial and confusing as Power Integrations is no longer accusing all of the identified products and now accuses new products not part of Godbout Exhibit 1)
40:16-21 40:25-41:11 41:13-14 41:17-22	A, R+ P (refers to products that are not accused; Power Integrations has never accused all "FPS products" or "Green FPS products")
43:6-8	
45:2-20 46:1 46:8-10 46:12-18	R + P (does not refer to the accused products or customers for those products); V (violates Court's order; not limited to activities after 10/20/04)
55:17-21 55:25-56:4 56:7-13 56:16-23 56:25-57:3 57:6-11 57:15-58:10 58:14-18 58:20-22	R + P (does not refer to the accused products or customers for those products); V (violates Court's order; not limited to activities after 10/20/04)
61:8-10	I (question refers to testimony not designated for the jury); H + F; R + P (does not refer to the

POWER INTEGRATIONS' DESIGNATION	FAIRCHILD'S SPECIFIC OBJECTION
61:13-16 61:20-23 62:4-10 62:12-15 62:17 62:21 63:13-16 63:19-24 64:4-7	accused products or the relevant time period); V (violates Court's order; not limited to activities after 10/20/04)
121:16-17 121:19-25	A, R+ P (does not refer to the accused products or the relevant time period; Power Integrations has never accused all "Green FPS products"); V (violates Court's order; not limited to activities after 10/20/04)

Fairchild's Objections to Power Integrations' Designations of the September 9, 2005 Deposition of S.T. Im (non-party Fairchild Korea)

POWER INTEGRATIONS' DESIGNATION	FAIRCHILD'S SPECIFIC OBJECTION
9:14-10:20 10:22	A, R+ P (does not refer to the accused products or the relevant time period; Power Integrations has never accused all "FPS products" or all "Green FPS products")
16:5-12	A, R+ P (does not refer to the accused products or the relevant time period; Power Integrations has never accused all "FPS products" or all "Green FPS products")
19:1-7	R + P (does not refer to the accused products or the relevant time period; there is no indication that the witness understood or applied the Court's construction of the term "frequency variation circuit")
33:20-34:9	V (Im Exhibit 5 [the underlying exhibit] is dated 7/28/04 and has been excluded as prior to the filing of the complaint; any alleged infringement prior to 10/20/04 is irrelevant, a waste of time, prejudicial, and potentially confusing); R + P (does not refer to the accused products)
38:10-39:16	V (Im Exhibit 5 [the underlying exhibit] is dated 7/28/04 and has been excluded as prior to the filing of the complaint; any alleged infringement prior to 10/20/04 is irrelevant, a waste of time, prejudicial, and potentially confusing); R + P (does not refer to the accused products); H + F
47:3-20	V (is not limited to alleged infringement after the filing of the complaint; any alleged infringement prior to 10/20/04 is irrelevant, a waste of time, prejudicial, and potentially confusing); A, R+ P (Power Integrations has never accused all "Green FPS products"; does not refer to alleged sales of the accused products); H + F
47:22	V (is not limited to alleged infringement after the filing of the complaint; any alleged infringement prior to 10/20/04 is irrelevant, a waste of time, prejudicial, and potentially confusing); A, R+ P (Power Integrations has never accused all "Green FPS products"; does not refer to alleged sales of the accused products); H + F
48:8-19 49:2-11	V (is not limited to alleged infringement after the filing of the complaint; any alleged infringement prior to 10/20/04 is irrelevant, a waste of time, prejudicial, and potentially confusing); A, R+ P (Power Integrations has never accused all "FPS products"; does not refer to alleged sales of the accused products); H + F; V (Im Exhibit 5 [the underlying exhibit] is dated 7/28/04 and has been excluded as prior to the filing of the complaint; any alleged infringement prior to 10/20/04 is irrelevant, a waste of time, prejudicial, and potentially confusing); I (the answer is not designated)
51:16-24	I (the question is not designated for the jury); R + P (is not limited to the accused products or relevant timeframe); V (is not limited to alleged infringement after the filing of the complaint; any alleged infringement prior to 10/20/04 is irrelevant, a waste of time, prejudicial, and potentially confusing)
55:8-15	H + F; R + P (not limited to the relevant time frame); V (is not limited to alleged infringement after the filing of the complaint; any alleged infringement prior to 10/20/04 is irrelevant, a waste of time, prejudicial, and potentially confusing)
55:20-58:12	H + F; R + P (does not refer to an accused product; not limited to the relevant time frame); V (is not limited to alleged infringement after the filing of the complaint; any alleged infringement prior to 10/20/04 is irrelevant, a waste of time, prejudicial, and potentially confusing); V (is not limited to alleged infringement after the filing of the complaint; any alleged infringement prior to 10/20/04 is irrelevant, a waste of time, prejudicial, and potentially confusing)
67:12-19 68:1-12 68:18-70:14 70:20-71:9	V (Im Exhibit 8 [the underlying exhibit] is dated 3/10/03 and has been excluded as prior to the filing of the complaint; any alleged infringement prior to 10/20/04 is irrelevant, a waste of time, prejudicial, and potentially confusing); H + F; R + P (does not refer to alleged infringement in the relevant time period)
72:1-16 72:22-73:25	V (Im Exhibit 9 [the underlying exhibit] is dated 1/11/04 and has been excluded as prior to the filing of the complaint; any alleged infringement prior to 10/20/04 is irrelevant, a waste of time, prejudicial, and potentially confusing); H + F; R + P (does not refer to accused products or

POWER INTEGRATIONS' DESIGNATION	FAIRCHILD'S SPECIFIC OBJECTION
	alleged infringement in the relevant time period)
85:6-13 85:21-86:15	V (Im Exhibit 12 [the underlying exhibit] is dated 12/15/04 and has been excluded as prior to the filing of the complaint; any alleged infringement prior to 10/20/04 is irrelevant, a waste of time, prejudicial, and potentially confusing); H + F; R + P (does not refer to accused products or alleged infringement in the relevant time period)

Fairchild's Objections to Power Integrations' Designations of the September 7, 2005 Deposition of K.O. Jang (non-party Fairchild Korea)

POWER INTEGRATIONS' DESIGNATION	FAIRCHILD'S SPECIFIC OBJECTION
6:22-7:5	
7:23-8:1	I (omits Fairchild's objections that limit deposition testimony); R + P
14:9-15:24	
21:15-19	
22:24-23:5	
24:20-22	
25:3-12	
25:23-26:7	
27:25-28:6	
28:24-29:8	
29:23-30:7	R + P (no evidence that "frequency modulation" is equivalent to the Court's construction of "frequency variation")
30:24-31:1	R + P (no evidence that "frequency modulation" is equivalent to the Court's construction of "frequency variation")
33:10-16	R + P (no evidence that the witness understood or applied the Court's construction of "soft start circuit")
34:11-18	R + P (no evidence that the witness understood or applied the Court's construction of "soft start circuit" or "frequency variation circuit")
38:13-14	
38:18-39:11	R + P (no evidence that the witness understood or applied the Court's construction of "soft start circuit" or "frequency variation circuit")
39:17-40:2	R + P (no evidence that the witness understood or applied the Court's construction of "soft start circuit" or "frequency variation circuit")
40:14-41:1	R + P (no evidence that the witness understood or applied the Court's construction of "soft start circuit" or "frequency variation circuit")
41:21-42:5	R + P (no evidence that the witness understood or applied the Court's construction of "soft start circuit" or "frequency variation circuit")
43:21-44:21	R + P (no evidence that the witness understood or applied the Court's construction of "soft start circuit" or "frequency variation circuit")
49:11-19	
50:7-12	
51:12-22	R + P (no evidence that the witness understood or applied the Court's construction of "frequency variation circuit")
52:7-16	

**Fairchild's Objections to Power Integrations' Designations of the September 8, 2005
Deposition of K.O. Jang (non-party Fairchild Korea)**

POWER INTEGRATIONS' DESIGNATION	FAIRCHILD'S SPECIFIC OBJECTION
16:15-21 17:1-8 17:21-25	R + P (no evidence that the witness understood or applied the Court's construction of "frequency variation circuit")
33:4-24	R + P (no evidence that the witness understood or applied the Court's construction of "frequency variation circuit"); H + F
37:6-38:10	I (refers to testimony not designated for the jury); R + P (no evidence that the witness understood or applied the Court's construction of "soft start circuit")
45:21-46:1	
46:13-49:12	
49:20-51:24	
53:18-54:15	
59:7-24	
61:11-18	
67:5-19	
68:2-15	
70:2-71:14	
71:23-72:5	
72:20-73:3	

Fairchild's Objections to Power Integrations' Designations of the October 4, 2005 Deposition of S. Jensen (Fairchild)

POWER INTEGRATIONS' DESIGNATION	FAIRCHILD'S SPECIFIC OBJECTION
4:25-5:22	
9:5-14	
11:23-12:1	A, R+ P (Power Integrations has never accused all "FPS products")
13:19-21	
15:22-16:5	I (refers to testimony not designated for the jury); R + P (does not refer to the accused products or the relevant time; waste of time; potentially confusing)
16:14-22	R + P (does not refer to the accused products or the relevant time; waste of time; potentially confusing)
23:14-24:10	R + P (no testimony that the accused products are sold or offered for sale to the "target accounts")
24:24-25:1	R + P (no testimony that the accused products are sold or offered for sale to the "target accounts")
26:2-14	R + P (no testimony that the accused products are sold or offered for sale by the listed distributors)
27:23-28:20	
31:4-13	
37:19-40:25	R + P (no relevance; waste of time; potentially confusing; not related to the accused devices)
42:22-43:5	R + P (no relevance; waste of time; potentially confusing; not related to the accused devices)
43:7-44:8	
46:9-17	I (refers to testimony not designated for the jury); R + P
48:9-19	R + P (no evidence that Fairchild sells the accused devices to Motorola in the relevant time)
49:16-19	
50:9-22	I (omits Fairchild's objections that limit deposition testimony); R + P
52:5-9	R + P (Godbout Exhibit 1 (the underlying exhibit) is prejudicial and confusing as Power Integrations is no longer accusing all of the identified products and now accuses new products not part of Godbout Exhibit 1)
52:23-53:13	
53:19-54:17	
55:25	
56:9-57:6	
58:13-59:4	I (omits Fairchild's objections that limit deposition testimony); R + P (Fairchild's interrogatory responses were based on Power Integrations' existing allegations. Since then, Power Integrations is no longer accusing all of the identified products and now accuses new products)
59:20-60:5	
70:21-71:9	
74:17-25	A, R+ P (Power Integrations has never accused all "FPS products")
75:9-76:10	I (omits Fairchild's objections that limit deposition testimony); R + P ("accused products" in question is different from products accused at trial)
76:11-20	
76:25-77:1	
77:3	
77:14-22	
85:14-25	I (refers to testimony not designated for the jury); A, R+ P (does not refer to the accused devices; Power Integrations does not accuse all "FPS products")
98:5-17	V (Jensen Exhibit 8 [the underlying exhibit] is dated 8/19/04 and has been excluded as prior to the filing of the complaint; any alleged infringement prior to 10/20/04 is irrelevant, a waste of time, prejudicial, and potentially confusing)
99:22-100:16	V (Jensen Exhibit 8 [the underlying exhibit] is dated 8/19/04 and has been excluded as prior to the filing of the complaint; any alleged infringement prior to 10/20/04 is irrelevant, a waste of

POWER INTEGRATIONS' DESIGNATION	FAIRCHILD'S SPECIFIC OBJECTION
	time, prejudicial, and potentially confusing); A, R+ P (does not refer to the accused devices; Power Integrations does not accuse all "Green FPS products")
101:6-102:12 102:20-104:13 104:15-23	V (Jensen Exhibit 8 [the underlying exhibit] is dated 8/19/04 and has been excluded as prior to the filing of the complaint; any alleged infringement prior to 10/20/04 is irrelevant, a waste of time, prejudicial, and potentially confusing); R + P
111:23-25	I (refers to testimony not designated for the jury); R + P (does not refer to the accused devices)
121:10-122:5 124:1-9	A, R + P (does not refer to the accused devices; Power Integrations has never accused all of Fairchild's "FSP products")
127:20-129:2	A, R + P (does not refer to the accused devices; Power Integrations has never accused all of Fairchild's "FSP products"); V (violates Court's order; not limited to activities after 10/20/04)
130:14-19 130:22	A, R + P (does not refer to the accused devices; Power Integrations has never accused all of Fairchild's "FSP products")

Fairchild's Objections to Power Integrations' Designations of the September 1, 2005 Deposition of C.K. Jeon (non-party Fairchild Korea)

POWER INTEGRATIONS' DESIGNATION	FAIRCHILD'S SPECIFIC OBJECTION
6:16-20	
7:10-12	I (omits Fairchild's objections that limit deposition testimony); R + P
9:3-17	I (omits Fairchild's objections that limit deposition testimony); R + P (the translation's of the witness's testimony use of the word "infringe" is prejudicial and potentially confusing as the witness's testimony makes clear that he believes the accused devices do not infringe)
11:5-8	
12:18-20	
12:24-13:1	
14:8-10	
14:16-18	
15:13-15	
16:3-15	
17:16-18	
17:20-21	
18:5-10	
18:12-19:18	
20:2-10	
20:13-16	
20:22-24	
22:16-20	
23:3-5	
23:9-12	
23:15	
23:17-18	
23:21	
25:16-17	
25:20-26:2	
26:4	
26:19-27:20	
27:22	
30:25-31:5	
31:12-22	
33:22-34:16	
35:1-2	
35:5-36:17	
39:21-40:8	
40:12-40:15	
40:18-19	
40:20-22 40:25-41:4 41:7-17 41:20-42:10 41:11-42:18	R + P (prejudicial and confusing as has no bearing on issue of infringement); V (violates Court's order; not limited to activities after 10/20/04)

POWER INTEGRATIONS' DESIGNATION	FAIRCHILD'S SPECIFIC OBJECTION
43:10-12	
43:15-21	
43:23-24	
45:1-4 45:7-9	R + P (prejudicial and confusing as has no bearing on issue of infringement); V (violates Court's order; not limited to activities after 10/20/04)
45:10-15	
46:7-9	
46:13-16	
47:25-48:11	
49:15-21	
49:23	I (question not designated for the jury)
50:5-10	
52:18-20	
66:6-10	
67:4-6	
67:15-68:4	

Fairchild's Objections to Power Integrations' Designations of the September 2, 2005 Deposition of C.K. Jeon (non-party Fairchild Korea)

POWER INTEGRATIONS' DESIGNATION	FAIRCHILD'S SPECIFIC OBJECTION
14:5-9	
15:22-16:14	
16:25-17:6	
17:8-2	
17:3-6 17:8-19 17:22-23	R + P (prejudicial and confusing as has no bearing on issue of infringement)
19:11-23	R + P (prejudicial and confusing as has no bearing on issue of infringement)
20:9-20:20	R + P (prejudicial and confusing as has no bearing on issue of infringement)
20:21-21:3	
21:9-23:7	R + P (prejudicial and confusing as has no bearing on issue of infringement)
23:10-14 23:17-19 24:2-4 24:7-18 24:20-21 25:13-17 26:4-16	R + P (prejudicial and confusing as has no bearing on issue of infringement)
26:17-27:1 27:25-28:10 28:25-29:2 29:5-8 29:10-15 29:18-19	R + P (prejudicial and confusing as has no bearing on issue of infringement)
29:20-30:13 30:16-20	R + P (prejudicial and confusing as has no bearing on issue of infringement)
31:8-32:8	
32:14-17	R + P (prejudicial and confusing as has no bearing on issue of infringement)
33:1-7 33:15-24 34:1-2	R + P (prejudicial and confusing as has no bearing on issue of infringement)
34:3-18 35:5-9 35:12-13	R + P (prejudicial and confusing as has no bearing on issue of infringement)
37:19-38:18	
38:1-38:8	R + P (witnesses lack of knowledge of opinion letter is prejudicial and potentially confusing as the letters have been produced)
38:9-18	
40:9-24	
41:24-42:1	R + P (witnesses lack of knowledge of opinion letter is prejudicial and potentially confusing as the letters have been produced)
42:2-20 43:4-8 43:10 43:12-24 44:15-25	R, P + F (testimony not on behalf of Fairchild; no evidence that witnesses understood or were applying the Court's claim construction)

POWER INTEGRATIONS' DESIGNATION	FAIRCHILD'S SPECIFIC OBJECTION
45:9-18	
50:9-16	
75:5-16	
76:8-12	

Fairchild's Objections to Power Integrations' Designations of the April 29, 2006 Deposition of H.K. Kim (non-party Fairchild Korea)

POWER INTEGRATIONS' DESIGNATION	FAIRCHILD'S SPECIFIC OBJECTION
6:14-18	
6:21-22	
7:3-4 7:10-11 7:25-8:2 8:6-8 8:18-21	R + P (it is irrelevant, waste of time, potentially confusing, and prejudicial to stress that English is not the witness's first language)
13:2-11	
16:14-19 17:16-22	R + P (witness's experience while working for a third party on non-accused devices is irrelevant and potentially confusing)
18:23-19:1	
19:5-7	R + P (witness's experience while working for a third party on non-accused devices is irrelevant and potentially confusing)
22:10-16	
23:7-11	A, R+ P (testimony not directed to the accused devices; Power Integrations has never accused all "FPS products")
25:19-20 25:23-26:12 26:15-16	A, R+ P (testimony not directed to the accused devices; Power Integrations has never accused all "FPS products")
27:17-19	A, R+ P (testimony not directed to the accused devices; Power Integrations has never accused all "Green FPS products")
27:20-22	
27:25-28:2	
28:5-15	
28:25-29:9	
30:9-20	
38:7-8	
38:11-15	
38:18-22	
40:4-9	R + P ("parts involved in lawsuit" are not the same as the parts accused by Power Integrations at trial; thus, the testimony is confusing, irrelevant, and prejudicial)
41:2-4	
41:7	
41:16-19	
43:5-6 43:13-23	R + P (the "parts in this case" referred to in the question are not the same as the parts accused by Power Integrations at trial (they omit some accused devices and include non-accused devices); thus, the testimony is confusing, irrelevant, and prejudicial; further, witness's lack of personal knowledge is irrelevant); F
44:11-12 44:15-17 46:12-15 46:18-19 46:21-23 47:1	R + P (the "parts in this case" referred to in the question are not the same as the parts accused by Power Integrations at trial (they omit some accused devices and include non-accused devices); thus, the testimony is confusing, irrelevant, and prejudicial; further, witness's lack of personal knowledge is irrelevant); F
52:5-6	R + P (the "parts in this case" referred to in the question are not the same as the parts accused by

POWER INTEGRATIONS' DESIGNATION	FAIRCHILD'S SPECIFIC OBJECTION
52:10-11 52:13-15 52:19 54:17-19 54:22	Power Integrations at trial (they omit some accused devices and include non-accused devices); thus, the testimony is confusing, irrelevant, and prejudicial; further, witness's lack of personal knowledge is irrelevant); F
62:13-21 62:24-25	R + P (the "parts in this case" referred to in the question are not the same as the parts accused by Power Integrations at trial (they omit some accused devices and include non-accused devices); thus, the testimony is confusing, irrelevant, and prejudicial); F
64:23-65:1 65:4 65:7-9 65:11-12	R + P (the "parts in this case" referred to in the question are not the same as the parts accused by Power Integrations at trial (they omit some accused devices and include non-accused devices); thus, the testimony is confusing, irrelevant, and prejudicial; further, witness's lack of personal knowledge is irrelevant); F
67:9-11 67:15-18 67:20-22	R + P (irrelevant; waste of time; potentially confusing; witness's lack of personal knowledge has no bearing on any issue in this case)
68:3-4	R + P (the "parts in this case" referred to in the question are not the same as the parts accused by Power Integrations at trial (they omit some accused devices and include non-accused devices); thus, the testimony is confusing, irrelevant, and prejudicial); F
68:7	
70:7-9 70:12-17 70:20-24	R + P (the "parts in this case" referred to in the question are not the same as the parts accused by Power Integrations at trial (they omit some accused devices and include non-accused devices); thus, the testimony is confusing, irrelevant, and prejudicial; further, witness's lack of personal knowledge is irrelevant); F
72:20	I (question not designated for the jury)
72:21-72:25 73:3-10 73:13-17 73:21-74:8 74:11-16 74:19-22 75:1-5 75:8	I (refers to testimony not designated for the jury); R + P (the "parts in this case" referred to in the question are not the same as the parts accused by Power Integrations at trial (they omit some accused devices and include non-accused devices); thus, the testimony is confusing, irrelevant, and prejudicial; further, witness's lack of personal knowledge is irrelevant); F
75:9-23 76:9 76:15-17 76:22-23 77:1-2	A, R+ P (testimony not directed to the accused devices; Power Integrations has never accused all "Green FPS products"; witness's lack of personal knowledge is irrelevant); F
79:3-17	
90:7-20	V (Kim Exhibit 4 [the underlying exhibit] is dated 7/16/04 and has been excluded as prior to the filing of the complaint; any alleged infringement prior to 10/20/04 is irrelevant, a waste of time, prejudicial, and potentially confusing); R + P
96:13-14 96:18-22 97:12-14 99:6-15	R + P (not limited to the accused products or even Fairchild devices; waste of time; potentially confusing and prejudicial)
101:12-102:4	V (Kim Exhibit 6 [the underlying exhibit] is dated 7/14/03 and has been excluded as prior to the filing of the complaint; any alleged infringement prior to 10/20/04 is irrelevant, a waste of time, prejudicial, and potentially confusing); R + P
104:24-105:12 105:20-25	V (Kim Exhibit 7 [the underlying exhibit] is dated 11/4/03 and has been excluded as prior to the filing of the complaint; any alleged infringement prior to 10/20/04 is irrelevant, a waste of time,

POWER INTEGRATIONS' DESIGNATION	FAIRCHILD'S SPECIFIC OBJECTION
106:3-7 107:21-23 108:4-8	prejudicial, and potentially confusing); R + P
108:9-17	
109:22-25	
110:2-6	
110:7-14	V (Kim Exhibit 9 [the underlying exhibit] is dated 8/21/03 and has been excluded as prior to the filing of the complaint; any alleged infringement prior to 10/20/04 is irrelevant, a waste of time, prejudicial, and potentially confusing); R + P
111:16-25	V (Kim Exhibit 10 [the underlying exhibit] is dated 10/28/03 and has been excluded as prior to the filing of the complaint; any alleged infringement prior to 10/20/04 is irrelevant, a waste of time, prejudicial, and potentially confusing); R + P
112:10-19	R + P (neither Kim Exhibit 11 [the underlying exhibit] nor the witness's testimony is relevant to any issue in this case)
113:6-14 123:22-23: 114:1-7	H + F (Kim Exhibit 12 [the underlying exhibit] constitutes hearsay and lacks foundation); R + P (witness's lack of personal knowledge is irrelevant)
114:8-21	V (Kim Exhibit 13 [the underlying exhibit] is dated 8/17/03 and has been excluded as prior to the filing of the complaint; any alleged infringement prior to 10/20/04 is irrelevant, a waste of time, prejudicial, and potentially confusing); R + P (does not relate to the accused products or the relevant time)

Fairchild's Objections to Power Integrations' Designations of the September 13, 2005 Deposition of C.S. Lim (non-party Fairchild Korea)

POWER INTEGRATIONS' DESIGNATION	FAIRCHILD'S SPECIFIC OBJECTION
8:14-25	
9:9-17	
10:18-25	
11:24-12:4	
13:17-22	
14:8-20	
15:1-15	R + P (it is irrelevant, waste of time, potentially confusing, and prejudicial to stress that English is not the witness's first language)
15:16-16:1	
19:21-23	
20:5-19	I (omits portion of answer); R + P (includes objection and discussion with attorney)
24:6-11	
25:1-6	
26:19-28:24	R + P (includes objection and discussion with attorney; not relevant to any issue in the case)
29:15-23	
30:8-25	R + P (there is no indication that the witness understood or applied the Court's construction of the term "frequency variation circuit")
31:3-20	R + P (there is no indication that the witness understood or applied the Court's construction of the term "frequency variation circuit")
32:2-21	R + P (there is no indication that the witness understood or applied the Court's construction of the term "frequency variation circuit")
33:7-15	R + P (there is no indication that the witness understood or applied the Court's construction of the term "soft start circuit")
33:16-34:1 34:8-35:8	A, R+ P (testimony does not relate to the accused devices; Power Integrations has never accused all "FPS products" or all "Green FPS products")
35:15-36:9	
38:13-18 38:22-39:11 41:13-22	A, R+ P (testimony does not relate to the accused devices; Power Integrations has never accused all "FPS products" or all "Green FPS products"); V (violates Court's order; refers to activities before 10/20/04; any alleged infringement prior to 10/20/04 is irrelevant, a waste of time, prejudicial, and potentially confusing)
43:25-44:18 44:21-25 45:2-4 45:6-21 45:23-46:14	V (Lim Exhibit 5 [the underlying exhibit] is dated 12/17/03 and has been excluded as prior to the filing of the complaint; any alleged infringement prior to 10/20/04 is irrelevant, a waste of time, prejudicial, and potentially confusing)
46:17-12	
47:14-24	
48:9-24	
49:2-19	
50:2-17	
50:19-51:6	
51:8-9	
52:21-53:3	

POWER INTEGRATIONS' DESIGNATION	FAIRCHILD'S SPECIFIC OBJECTION
53:5-11	
53:13	
53:15-17	
53:19-20	
53:22-24	
54:2-5	
54:7	
54:9-11	
54:13-15	
54:17-21	
54:23-24	
55:2	
55:4	
55:6-7	
55:9-12	
56:2-6	
56:12-23	

Fairchild's Objections to Power Integrations' Designations of the December 9, 2005 Deposition of V. Sarkissian (non-party)

POWER INTEGRATIONS' DESIGNATION	FAIRCHILD'S SPECIFIC OBJECTION
6:11-14	
13:7-8	
14:10-13	I (question not designated for the jury); R + P
21:23-25	I (relies on testimony not designated for the jury); R + P
24:16-23	I (relies on testimony not designated for the jury; question not designated for the jury); R + P
26:5-6 27:8-9	I, R + P (not clear that designated answer relates to designated question)
28:12	I (partial answer; question not designated); R + P
28:13-15	I (relies on testimony not designated for the jury); R + P
28:22-24	I (only partial answer designated); R + P
29:16	I (only partial answer designated; question not designated); R + P
31:14-15	I (relies on testimony not designated for the jury; question not designated); R + P
31:16-18	I (relies on testimony not designated for the jury; question not designated); R + P
32:7-9	
32:22-24	
33:13-21	
34:3-6	
35:22-24	
55:11-15	
55:23	I (question not designated); R + P
56:3-5	I (refers to testimony not designated for the jury); R + P
56:21-57:5	I (question not designated; only portion of answer designated) ; R + P
59:17-19	
59:23-24	I (question not designated) ; R + P
59:25-60:1	
60:2-3	I (answer to question not designated); R + P
62:20-25	
63:8-15	
65:15-21	
65:23-66:1	
66:18-67:1	
67:7-11	I (question not designated); R + P
68:1-8	R + P
69:16-20	
71:3-19	
73:4-10	I (question not designated); R + P
74:5-8	I (refers to testimony not designated for the jury); R + P
74:22-25	I (refers to testimony not designated for the jury); R + P
75:4-7	I (refers to testimony not designated for the jury); R + P
76:20-77-3	I (refers to testimony not designated for the jury); R + P
79:12-14 79:18-20	I (refers to testimony not designated for the jury); R + P

POWER INTEGRATIONS' DESIGNATION	FAIRCHILD'S SPECIFIC OBJECTION
82:16-19	
87:19-88:1	I (refers to testimony not designated for the jury); R + P
88:8-9	I (question not designated); R + P
88:11	I (question not designated); R + P
91:15-22	
92:10-15	
93:7-8	
93:10-11	
93:12-17	
96:3-8	
96:14-24	R + P (not relevant to any issue in the case)
97:20-98:3 98:5-99:1	R + P (not relevant to any issue in the case)
99:19-22	
101:23-102:7	
102:18-19	I (question not designated); R + P
106:14-23	I (refers and relies upon testimony not designated for the jury); R + P
107:1-4	
107:7-13	
107:18-20	
107:22-24	
108:5-8	
109:21-25	
122:12-18	
125:13-20	R + P (not relevant to any issue in the case)
126:17-19	I (question not designated); R + P

Fairchild's Objections to Power Integrations' Designations of the March 31, 2006 Deposition of S. Slayton (non-party)

POWER INTEGRATIONS' DESIGNATION	FAIRCHILD'S SPECIFIC OBJECTION
6:10-13	
11:11-13 11:19-22	R + P (not relevant to any issue in the case)
12:10-13:21	
13:24-14:3	
14:7-14	
14:17-15:14	
15:19-21	
16:20-25	I (refers and relies upon testimony not provided to the jury)
17:4-19	R + P (not relevant to any issue in the case)
17:23-18:6	
20:16-21:1	I (only designates portion of witness's answer); R + P
21:10-14	I (question not designated); R + P
23:23-24:6	
27:1-4	
27:14-22	
29:2-23	
32:5-9	
33:23-34:13	
36:5-10	
38:25-39:4	
50:20-51:3	
51:16-18	
51:22-52:11	H, F + P
60:20-61:6	H, F + P
61:11-15	R + P (the witness misidentified the accused products (including non-accused devices and omitting accused devices); also, witness does not know the asserted claims, has not reviewed the prosecution histories, and has not reviewed the Court's claim construction; this makes his testimony irrelevant, confusing to the jury, and prejudicial); O
70:10-16	R + P (the witness misidentified the accused products (including non-accused devices and omitting accused devices); also, witness does not know the asserted claims, has not reviewed the prosecution histories, and has not reviewed the Court's claim construction; this makes his testimony irrelevant, confusing to the jury, and prejudicial); H + F (speculation); O
72:5-73:2	R + P (the witness misstates the law; irrelevant, confusing to the jury, and prejudicial); H + F (speculation); O
75:24-76:1 76:4-5	R + P (the witness misidentified the accused products (including non-accused devices and omitting accused devices); also, witness does not know the asserted claims, has not reviewed the prosecution histories, and has not reviewed the Court's claim construction; this makes his testimony irrelevant, confusing to the jury, and prejudicial); H + F (speculation); O
77:22-79:4 79:25-80:10 80:15-24 81:1-4 81:16-21	R + P (the witness misidentified the accused products (including non-accused devices and omitting accused devices); also, witness does not know the asserted claims, has not reviewed the prosecution histories, and has not reviewed the Court's claim construction; this makes his testimony irrelevant, confusing to the jury, and prejudicial); H + F (speculation); V (violates Court's order; not limited to activities after 10/20/04); O

POWER INTEGRATIONS' DESIGNATION	FAIRCHILD'S SPECIFIC OBJECTION
82:5-21	R + P (the witness misidentified the accused products (including non-accused devices and omitting accused devices); also, witness does not know the asserted claims, has not reviewed the prosecution histories, and has not reviewed the Court's claim construction; this makes his testimony irrelevant, confusing to the jury, and prejudicial); H + F (speculation); V (violates Court's order; not limited to activities after 10/20/04); O
84:19-86:12	R + P (the witness misidentified the accused products (including non-accused devices and omitting accused devices); also, witness does not know the asserted claims, has not reviewed the prosecution histories, and has not reviewed the Court's claim construction; this makes his testimony irrelevant, confusing to the jury, and prejudicial); H + F (speculation); V (violates Court's order; not limited to activities after 10/20/04); O
86:22-87:11	R + P (the witness misidentified the accused products (including non-accused devices and omitting accused devices); also, witness does not know the asserted claims, has not reviewed the prosecution histories, and has not reviewed the Court's claim construction; this makes his testimony irrelevant, confusing to the jury, and prejudicial); H + F (speculation); V (violates Court's order; not limited to activities after 10/20/04); O
89:2-11	R, P, H, F + O
90:22-91:9 91:12-23	R + P (the witness misidentified the accused products (including non-accused devices and omitting accused devices); also, witness does not know the asserted claims, has not reviewed the prosecution histories, and has not reviewed the Court's claim construction; this makes his testimony irrelevant, confusing to the jury, and prejudicial); H + F (speculation); V (violates Court's order; not limited to activities after 10/20/04); O
124:2-125:4 125:13-15 125:20-23	R + P (the witness misidentified the accused products (including non-accused devices and omitting accused devices); also, witness does not know the asserted claims, has not reviewed the prosecution histories, and has not reviewed the Court's claim construction; this makes his testimony irrelevant, confusing to the jury, and prejudicial); H + F (speculation); V (violates Court's order; not limited to activities after 10/20/04); O
132:16-134:1	R + P (the witness misidentified the accused products (including non-accused devices and omitting accused devices); also, witness does not know the asserted claims, has not reviewed the prosecution histories, and has not reviewed the Court's claim construction; this makes his testimony irrelevant, confusing to the jury, and prejudicial); H + F (speculation); V (violates Court's order; not limited to activities after 10/20/04); O
134:23-135:10	R + P (the witness misidentified the accused products (including non-accused devices and omitting accused devices); also, witness does not know the asserted claims, has not reviewed the prosecution histories, and has not reviewed the Court's claim construction; this makes his testimony irrelevant, confusing to the jury, and prejudicial); H + F (speculation); V (violates Court's order; not limited to activities after 10/20/04); O

EXHIBIT 12B

Power Integrations v. Fairchild
Case No. 04-1371

**Defendant Fairchild Semiconductor International, Inc.'s
Cross-Designations to Plaintiff's Deposition Designations
served June 16, 2006**

DATE	DEPONENT	PARTY	DEFENDANT'S CROSS DESIGNATION (page: line)
1/10/06	J. Barnes	Fairchild	6:10-1; 6:18-7:11; 9:8-10:7; 12:10-23; 13:18 -15:5; 45:17-46:3; 81:3-10; 81:19-82:22; 87:3-4; 87:9-18; 88:13-6; 89:1-5; 99:2-4; 99:9-11; and 99:21-100:9.
1/11/06	T. Beaver	Fairchild	7:2-14:20; 16:6-8; 24:22-25:3; 36:24-37:11; 39:23-40-22; 49:3-17; 50:22-51:5; 51:13-21; 52:20-53:10; 60:22-25; 61:14-25; 62:8-20; 63:1-64:6; 64:22 - 24; 69:21 - 70:1; 75:20-76:3; 90:25-91:16; 97:4 - 8; 98:19 - 99:2; 99:11 - 19; 106:10 - 107:2; 108:11 - 18; 109:12 - 110:4; 110:19 -111:9; and 113:18-25.
9/12/2005	H.S. Choi	Fairchild	10:14 - 20:12:1 -2; 17:18-20; 22:11-23:19; 27:23-28:4; 31:4-32:7; 35:8-12; 36:2 - 15; 46:14-20; 51:11-24; 52:16-54:7; 64:17-23; 75:4-22; 76:4-13; 76:18-77:15; 85:9-86:4; 88:1-10; 88:24-89:7; 90:14-91:7; 93:12-94:12; 108:3-6; and 115:16-19.
3/28/2006	R. Conrad	Fairchild	9:5-14; 10:11-22; 38:18-21; 45:3-9; 59:9-60:10; 62:7-10; 69:18; 70:6-8; 70:19-25; 75:1-20; 79:25-81:11; 82:24-

			83:4; 83:21-84:7;85:11-86:1; and 86:4-13.
9/30/2005	H. Engelbrechten	Third Party	24:2-25:5; 39:21-42:12; 67:17-69:2; 71:9-12; 71:15-19; 74:1-18; 74:21-75:14; 109:25-110:13; 110:21-111:13; 112:15-20;114:13-24; and 124:17-126:16.
10/4/05	R. Gendron	Fairchild	5:9-6:10; 30:14-31:15; 41:23-42:5; 43:15-17; 44:7-11; 45;24-25; 46:19-55:16; and 62:22-63:12.
9/9/05	S.T. Im	Fairchild	6:6-12; 9:7-13; 10:21; 16:1-4; 18:18-25; 19:8-15; 20:20-21:5; 22:2-18; 33:7-19; 40:2-14; 42:5-10;42:18-25; 43:22-44:5; 44:25-45:7; 45:13-22; 47:21; 47-23-48:7; 48:20-49:1; 49:12-50:24; 51:8-15; 55:16-18; 71:10-25; 72:17-21; and 85:14-20.
9/7/05	K. O. Jang	Fairchild	17:9-18:22; 20:2-21:2; 30:8-17; 31:25-33:3; 33:17-21; 38:15-17; 39:12-16; 41:2-6; 44:22-24; and 49:20-50:6.
9/8/05	K. O. Jang	Fairchild	17:9-19; 31:14-33:3; 34:9-23; 36:15-37:5; 39:18-40:20; 44:24-45:20; 63:21-64-21;68:16-69:5; 72:6-19;73:4-11; and 75:11-76:21.
10/4/05	S. Jensen	Fairchild	18:25-19:4; 25:14-18; 25:23-26:1; 26:15-16; 29:6-7; 44:9 - 45:5; 52:13-21; 57:7-9; 59:5-6;73:19-74:10;;75:1-8; 86:1-2; 102:13-18; 129:3-4; 130:11-13; and 130:23-131:1.
9/1/05	C.K. Jeon	Fairchild	9:18-11:4; 12:21-23; 15:16-16:2; 17:22-18:3; 21:9-22:15; 22:21-25; 23:6-7; 23:22-25:11; 26:11-15; 31:23-25; 33:8-10;38:1-6; 38:15-39:3; 44:17-24; 45:19-20; 47:3-15; 50:11-16; and 55:14-17.

9/2/05	C.K. Jeon	Fairchild	14:10-14; 19:24-20:8; 23:20-25; 25:22-26:2; 32:9-13; 32:18-22; 35:15-36:25; 38:19-39:14; 39:22-40:4; 40:25-41:5; 41:10-22; 45:1-5; 45:22-46:8; 58:5-17; 58:23-24; 59:1-24; 60:12-13; 60:15-24; 61:3-4; 61:13-14; 61:18-62:21; 63:4-68:25; 69:4-74:7; 75:17-20; 75:23-76:7; 77:14-19; 78:7-14 and 79:4-8.
4/29/06	H.K. Kim	Fairchild	11:24-12:4; 19:22-24; 20:4-12; 22:17-23:5; 39:25-40:3; 40:10-15; 44:19-45:5; 45:18-24; 46:2-10; 47:16-24; 48:4-23; 49:5-9; 49:11-5; 49:17-23; 51:4-8; 51:10-14; 51:16-52:3; 52:21-53:13; 54:9-15; 54:24-55:13; 57:2-12; 61:20-62:11; 63:2-17; 91:4-16; 91:21-3; 92:23-93:16; 94:17-96:11; 96:23-97:10; 97:15-20; 99:20-100:7; 100:15-18; 100:21-101:4; 101:9-11; 102:19-103:1; 103:21-104:21; 106:9-107:7; 108:18-109:2; 112:1-9; and 112:20-113:5.
9/13/05	C.S. Lim	Power Integrations	11:8-24; 13:2-16; 16:21-23; 19:12-20; 20:20-22; 31:1; 38:19; 39:14-40:7; 51:11-52:19; and 56:7-10.
12/9/05	V. Sarkissian	Third Party	6:15-7:17; 11:1-23; 12:6-11; 13:10-11; 13:18-21; 14:5-9; 14:14-15:4; 22:10-22; 23:3-11; 30:24-31:6; 31:10-12; 32:17-21; 32:25-33:12; 52:9-53:24; 56:14-19; 57:6; 59:20-22; 66:3-16; 67:2-6; 67:12-22; 69:21-70:3; 70:12-71:2; 71:24-72:2; 72:8-22; 73:11-74:4; 74:9-13; 75:8-76:19; 79:2-10; 79:22-80:13; 84:23-85:2; 87:10-17; 88:4-7;

			88:12-17; 90:9-14; 92:19-93:6; 94:3-25; 99:2-17; 102:13-16; 102:13-16; 102:21-23; 103:2-5; 104:4-106:13; 107:15-17; 108:1-4; 110:12-16; 111:1-22; 115:1-15; 122:19-20; and 127:3-5.
3/31/06	S. Slayton	Fairchild	14:4-6; 17:20-22; 18:25-19:12; 21:2-3; 21:16-17; 21:20-23:11; 25:5-8; 25:11-14; 27:5-8; 27:23-28:3; 28:10-18; 29:24-30:9; 30:12-13; 30:15-18; 32:10-33:11; 36:11-15; 38:2-24; 43:21-25; 44:10-25; 45:14-46:10; 52:17-24; 54:18-23; 56:11-15; 56:23-57:3; 60:5-19; 61:16-62:6; 65:11-21; 66:23-67:13; 67:21-68:17; 69:5-9; 74:20-75:20; 76:7-77:11; 77:17-21; 79:7-10; 80:11-14; 81:22-82:4; 87:12-88:7; 92:14-21; 95:1-19; 98:6-16; 98:23-99:2; 99:8-13; 99:23-100:5; 104:4-15; 105:14-106:17; 117:2-9; 117:18-118:16; 118:21-119:17; 125:5-11; 125:16-19; 126:13-127:7; 128:4-129:15; 129:25-130:4; 130:12-17; and 134:2-7.